

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Case: 2:24-mj-30301

Assigned To : Unassigned

Assign. Date : 7/29/2024

SEALED MATTER (LH)

Darnell DANNER

Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2024 - July 10, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(a)(1)

Engaging in the business of dealing firearms without a license

18 U.S.C. § 922(j)

Knowingly possessing a stolen firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 29, 2024City and state: Detroit, Michigan*Complainant's signature*Special Agent Brady Rees - ATF*Printed name and title**Judge's signature*Honorable Anthony P. Patti, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Brady W. Rees, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. I have been an ATF Special Agent since January 2016, and I have had extensive law enforcement training, including at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Prior to becoming an ATF Special Agent, I was a police officer with the City of Novi, in Michigan, for approximately three years. I also have a bachelor’s degree in criminal justice.

3. As an ATF Special Agent, I have participated in numerous criminal investigations, including investigations involving firearms, armed drug tracking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources.

4. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or

other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is intended to show that there is sufficient probable cause for the complaint and requested warrant and does not set forth all information known to law enforcement regarding this investigation.

5. Probable cause exists that Darnell DANNER (DOB: XX/XX/1984) violated 18 U.S.C. § 922(a)(1) (Engaging in the business of dealing firearms without a license) and 18 U.S.C. § 922(j) (Knowingly possessing a stolen firearm).

I. PROBABLE CAUSE

6. In June and July 2024, DANNER sold several firearms to an ATF agent who was working in undercover capacity. According to law enforcement database, DANNER does not have a federal firearms license needed to engage in the business of firearm sales.

7. On June 11, 2024, in Detroit, Michigan, DANNER sold to the undercover agent one (1) Glock, Model: 22, .40 caliber pistol containing 8 rounds of assorted .40 caliber ammunition.

8. On July 2, 2024, in Detroit, Michigan, DANNER sold to the undercover agent one (1) Glock, Model: 48, 9mm caliber pistol containing 10 rounds of assorted 9mm caliber ammunition. According to law enforcement

databases, this firearm was neither purchased nor registered to DANNER, and it was reported stolen in February of 2024.

9. On July 10, 2024, in Detroit, Michigan, DANNER sold to the undercover agent a one (1) Smith & Wesson, Model: MP40, Serial Number: DSS7833, .40 caliber pistol containing 5 rounds of assorted .40 caliber ammunition. According to law enforcement databases, this Smith & Wesson pistol was neither purchased nor registered to DANNER, and it was reported stolen in October of 2014.

10. Further investigation revealed that the Smith & Wesson pistol was a Detroit Police Department issued firearm. The “Detroit PD” markings were visible on the firearm along with the Detroit PD serial number “0260.” There were scratches and gouges over the “Detroit PD” markings, suggesting that there was an unsuccessful attempt to deface these markings.

Figure 1



11. Since the Smith & Wesson gun was not purchased or registered to DANNER and given its above-mentioned markings and characteristics, it is reasonable to believe that DANNER knew or had reasonable cause to believe that the firearm had been stolen.

12. I consulted with ATF Nexus Agent–Special Agent Michael Jacobs, who made a preliminary opinion, based on the Smith and Wesson pistol’s physical description, that it was not manufactured in the State of Michigan and therefore previously traveled in interstate or foreign commerce.

II. CONCLUSION

13. Probable cause exists that DANNER engaged in the business of dealing firearms without a license and knowingly possessed a stolen firearm between June 11 and July 10, 2024, in the Eastern District of Michigan, in violation of 18 U.S.C. §§ 922(a)(1)(A) and (j).

Respectfully submitted,



Brady Rees, Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: July 29, 2024